

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

BARBARA ANNE ANDERSON,)
)
 Plaintiff,)
)
 vs.)
)
 ALFA LAVAL, INC. et al.)
)
 Defendants.)

CAUSE NO. 760CL06006790-00

**PLAINTIFF'S AMENDED ANSWER TO INTERROGATORY NO. 5 IN RESPONSE TO
GENERAL ELECTRIC COMPANY'S FIRST INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

COMES NOW Plaintiff, Barbara Anne Anderson, by and through her counsel and provides this her Amended Answer to Interrogatory No. 5 in response to General Electric Company's First Interrogatories and Requests for Production of Documents.

INTERROGATORY NO. 5: With respect to each asbestos-containing product and place of employment identified in response to Interrogatory No. 4, above, please provide the following:

- a. A detailed description of your work methods and procedures with respect to the asbestos products and/or materials you used, including but not limited to, the manner in which such products were applied and/or used, whether such products were cut, sawed, mixed, molded, etc. and the manner and method by which this was done, the tools used in working with them, whether you wore a respirator or other mask while working with or around such products and a detailed description thereof, whether you wore any other protective or safety equipment while working with or around such products and a detailed itemization and description thereof.
- b. The working conditions under which you worked with or around the asbestos-containing products or materials, including but not limited to whether in the open air, confined space or enclosed shop, type of ventilation and the length of time and frequency of contact with such products under any of the described conditions.
- c. State verbatim, or with as complete and accurate detail as possible, with respect to each product identified, all such product instructions, recommendations and/or warnings (i.e., printed on the tag, tag covering, packaging, instruction sheet accompanying the product, etc.) and include in your answer the date or

EXHIBIT

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approximate date you first saw any such instructions, recommendations and/or warnings and the date or approximate date or each subsequent occasion on which you saw any such instructions, recommendations and/or warnings.

- d. Identify all literature of whatever kind that you have knowledge of regarding each product previously identified, including any and all documents which evidence or establish your exposure to or use of each such product, stating for each item identified, the subject matter, document title, publication date, location, and name and address of each individual in whose possession or custody such literature presently is.
- e. State the details of the storage of each of the asbestos products identified, including but not limited to: where such products were stored, how the same were stored, how the same were transported from storage to the job site, how the same were stored on the job site and what involvement, if any, you had with the storage and/or transportation of said products.

ANSWER:

Building were under construction while Plaintiff was working at Atlantic Fleet Headquarters and for Civil Service in Washington DC, between 1978 and 1985.

AMDENDED ANSWER:

Buildings in which Plaintiff worked were under construction and/or undergoing renovations throughout the 1960's and 1970's. Plaintiff was exposed to asbestos during that time period. Plaintiff reserves the right to supplement her Answer to this request at a later date.

Respectfully submitted,

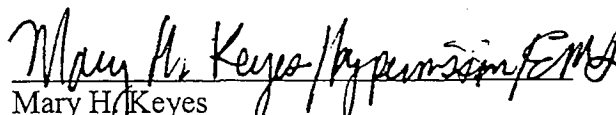


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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on the 29th day of December 2006, a true and correct copy of the foregoing document was served by Plaintiff on all anticipated counsel of record.


Mary H. Keyes